Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	WT Docket 95-56
Amendment of the Commission's Rules	)	
Concerning Low Power Radio and Automated	)	
Maritime Telecommunications System	)	
Operations in the 216-217 MHz Band	)	

COMMENTS OF PRONET, INC.

ProNet, Inc.

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Dated: July 18, 1995

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SUMMARY

As the original proponent of a spectrum allocation for Law Enforcement Tracking Systems, ProNet strongly supports the Commission's proposal to allocate channels in the 216-217 MHz band for LPRS and, specifically, to dedicate two of those channels for LETS operations. As documented in ProNet's prior filings in this docket, LETS operations, like ProNet's ETS, have a significant, tangible effect on combating crime and preserving life and property. Accordingly, ProNet urges the Commission to act expeditiously to finalize the allocation for this important service.

ProNet, or its predecessor in interest, have operated electronic tracking systems for over 20 years. During that time, ProNet's ETS has amassed a record of success that is truely stunning. In 1994 alone, ETS systems have been responsible for 204 captures and recovery of millions of dollars of property. Indeed, because ETS captures have resulted in a 100 percent conviction rate, the effect of these arrests has, according to FBI records, a five-fold greater impact on crime. Quite simply, in an era where violent crime is unfortunately on the rise, ProNet's ETS provides a practical, simple, cost-effective, and proven tool for law enforcement agencies. The allocation of even a few channels for such operations will assist in the expansion of these systems and a direct, commensurate decrease in felonious activity.

As discussed below, ProNet commends the Commission's considered and balanced approach to implementation of LPRS. ProNet generally supports the channelization, channel allocations, service areas, license requirements, eligibility, technical rules, system requirements, and application proposals in the *Notice*. ProNet offers only two minor

modifications herein that it believes will improve the Commission's overall LPRS implementation framework. First, ProNet believes the Commission should modify the band power limitations for, at a minimum, channel nos. 21 and 22 to limit operations on those frequencies to 100 mW and avoid detrimental interference to LETS operations. Second, ProNet encourages the Commission to expand the range of eligible LPRS licensees to include campus security to allow the introduction of a requested new "panic button" application of ETS technology.

ProNet, as discussed below, strongly supports the Commission's Notice and commends the Commission for recognizing the benefits of LPRS technologies and providing a sound framework for the introduction of these technologies that carefully balances all users needs. ProNet urges the Commission now to act promptly on its proposal and finalize the allocation. The allocation will provide substantial benefits for the public and delay can only be harmful.

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ProNet, Inc. ("ProNet"), by its attorneys, submits the following comments in response to the Notice of Proposed Rulemaking ("*Notice*") in the above-captioned docket. Partially in response to a petition for rulemaking filed by ProNet, the *Notice* proposes an allocation in the 216-217 MHz band for a new Low Power Radio Service ("LPRS"), including two channels dedicated for Law Enforcement Tracking Systems ("LETS"). As discussed below, ProNet strongly supports the Commission's proposal, which will provide a permanent spectrum home for law enforcement operations that have a tangible, immediate ability to save lives and reduce crime, and urges the Commission to act expeditiously to conclude this rulemaking. ProNet also offers a few minor suggestions regarding the specific rule proposals to ensure optimum spectrum efficiency and to enable interference-free use of the band.

I. INTRODUCTION

ProNet, through its subsidiary Electronic Tracking Systems, makes and installs electronic tracking systems ("ETS") for use by law enforcement, a proven, reliable, and effective tool against crime. ProNet's tracking systems are designed to immediately notify

authorities that a crime has been committed and to provide a tracking signal to rapidly locate and apprehend robbers, thieves, and other law breakers. Because ETS facilitates interception and capture of criminals before they can hide or dispose of evidence, ETS promotes recovery of stolen goods before they are lost and, by allowing apprehension of criminals "red-handed," increases conviction rates and prevents downstream crimes these same criminals could later commit. Over the many years in which ProNet systems have been installed, law enforcement has had a 100 percent conviction rate for its thousands of captures and has had millions of dollars in stolen "loot" recovered.

ProNet's tracking system consists of miniature, very low power, battery operated, concealed transmitters that are triggered, in most cases, by unlawful events. These "TracPacs" are disguised in a fashion so that they accompany stolen goods, emitting a traceable low power signal. Once the TracPacs are activated by a crime, highly sensitive directional receivers, which are located in law enforcement vehicles, helicopters, or at a few fixed sites, track and locate the crime while it is still in progress.[1] Law enforcement directly monitors for those signals in their own dispatch center, and when triggered, previously deployed trackers scramble to locate the unlawful incident, protect the public, and apprehend the felon. On average, all this occurs in *less than 15 minutes*. ETS is thus unique among communication systems in that it provides true electronic distress signaling -- the presence of a ETS signal on the air indicates that a life-threatening felony event is happening *now* and that an *emergency* situation exists.

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[1] Key technical parameters of the equipment are in Exhibit A.

ProNet's technology has a demonstrated record of success. ProNet's predecessor in interest began operating 23 years ago on an experimental frequency in the 219 MHz band in Shreveport, Louisiana. ProNet's operations have since expanded dramatically to include approximately 30,000 transmitters in operation, used by over 90 Law Enforcement Agencies, Police, and FBI in over 100 cities and communities around the country.[2] Many other cities have also requested to have the ETS system installed or are considering doing so.

Based upon the vast record of success with the ETS system and ProNet's considerable operational expertise derived from years of experimental use, ProNet filed a petition for rulemaking to establish a permanent allocation for a law enforcement tracking service in 1991. This petition detailed the experiences of a number of law enforcement agencies and the remarkable decrease in bank robberies in areas where ETS was installed. Unfortunately, however, the frequencies sought by ProNet were ultimately allocated for IVDS operations. As a result, ProNet filed an amendment to its petition in October of 1993, which detailed additional experiences obtained in the intervening years and expanded the request to seek Commission consideration of all available spectrum in the 216-220 MHz band.

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[2] With the new allocation of spectrum specifically for LETS, ProNet will begin transitioning its existing systems to 216-217 MHz frequencies. In addition, all new operations will be initiated on LPRS LETS channels. In view of the significant existing operations on experimental frequencies in the 219 MHz band, however, ProNet requests some additional flexibility from the Commission in migrating to LETS channels. Specifically, ProNet would like the flexibility to continue its operations in the 219 MHz band on a secondary, non-interference basis as the transition to LPRS occurs. Given the need for coordination of a LETS service with many neighboring law enforcement agencies in a metropolitan area, ProNet also asks that no date certain be placed on its expiration. ProNet accordingly requests "grandfathering" authority from the Commission and relief from the obligation of continuing to file experimental license renewals.

Clearly, ProNet is gratified and highly supportive of the Commission's recent *Notice* proposing to allocate spectrum in the 216-217 MHz band for LETS. Specifically, the *Notice* proposes to channelize the 216-217 MHz band into forty 25 kHz channels. The thirty channels in the lower part of this band would be allocated to a new Low Power Radio Service ("LPRS") and the upper 10 channels allocated to Automated Maritime Telecommunications Services ("AMTS"). Although ProNet originally requested that six channels be dedicated for LETS, the Notice proposes to dedicate two LPRS channels specifically for LETS and requests comment on allowing LETS operations to use additional LPRS channels on a shared, non-interference basis. The *Notice* also limits the lowest 20 channels in the band to a maximum of 100 mW transmitter output power to avoid interference with the adjacent TV channel 13. As discussed below, aside from a few minor suggestions to facilitate operations in the band, ProNet believes the Commission's proposal is in the public interest and should be expeditiously finalized.

II. ESTABLISHMENT OF A LETS ALLOCATION IN THE 216-217 MHz BAND WILL SERVE THE PUBLIC INTEREST

ProNet's ETS is a uniquely effective weapon against crime in an era where criminal activity is unfortunately on the rise. In the years that ProNet has operated LETS, crime overall has increased substantially in the U.S., from 12,109,000 crimes committed in 1983 to 14,438,000 crimes committed in 1992, over a 19 percent increase in 10 years.[3] Bank

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[3] Department of Commerce, Bureau of the Census, Statistical Abstract of the United States at 198 (114 Ed. Sept 1994).

robberies, in particular, have risen during this period, an alarming 32.5 percent from 1983 to 1992.[4] Congress has attempted to respond by enacting strong anti-crime legislation, but the sometimes vague threat of capture has not, apparently, had the desired effect of reducing criminal activity.

Against this backdrop, the record of ETS' success is stunning. During the year 1994 alone, for example, ETS was used in a remarkable 204 captures, recovering $1,800,000. From the FBI's historical records, ProNet understands that an early capture prevents *at least* five more downstream robberies and that, on average, a robber commits up to 10 robberies before capture by normal investigative methods. Based upon these statistics, ProNet estimates that in 1994, approximately 1000 additional robberies were prevented with these ETS captures saving many millions more in recovered assets.

Orange County, California, provides a compelling illustration of the benefits of rapid capture and the prevention of "downstream" crimes. Orange County just reported its bank robbery rate after the installation of ETS in 1991. This County is made up of 24 communities and police departments all working together within the ETS System. Orange County reported that numerous captures with the ETS system have helped recover nearly three quarters of a million of dollars in stolen property over these years. The results of Figure 2 also graphically show how the captures of a previous year decreased robbery incidences for the following years in Orange County due to the serial nature of robbers:

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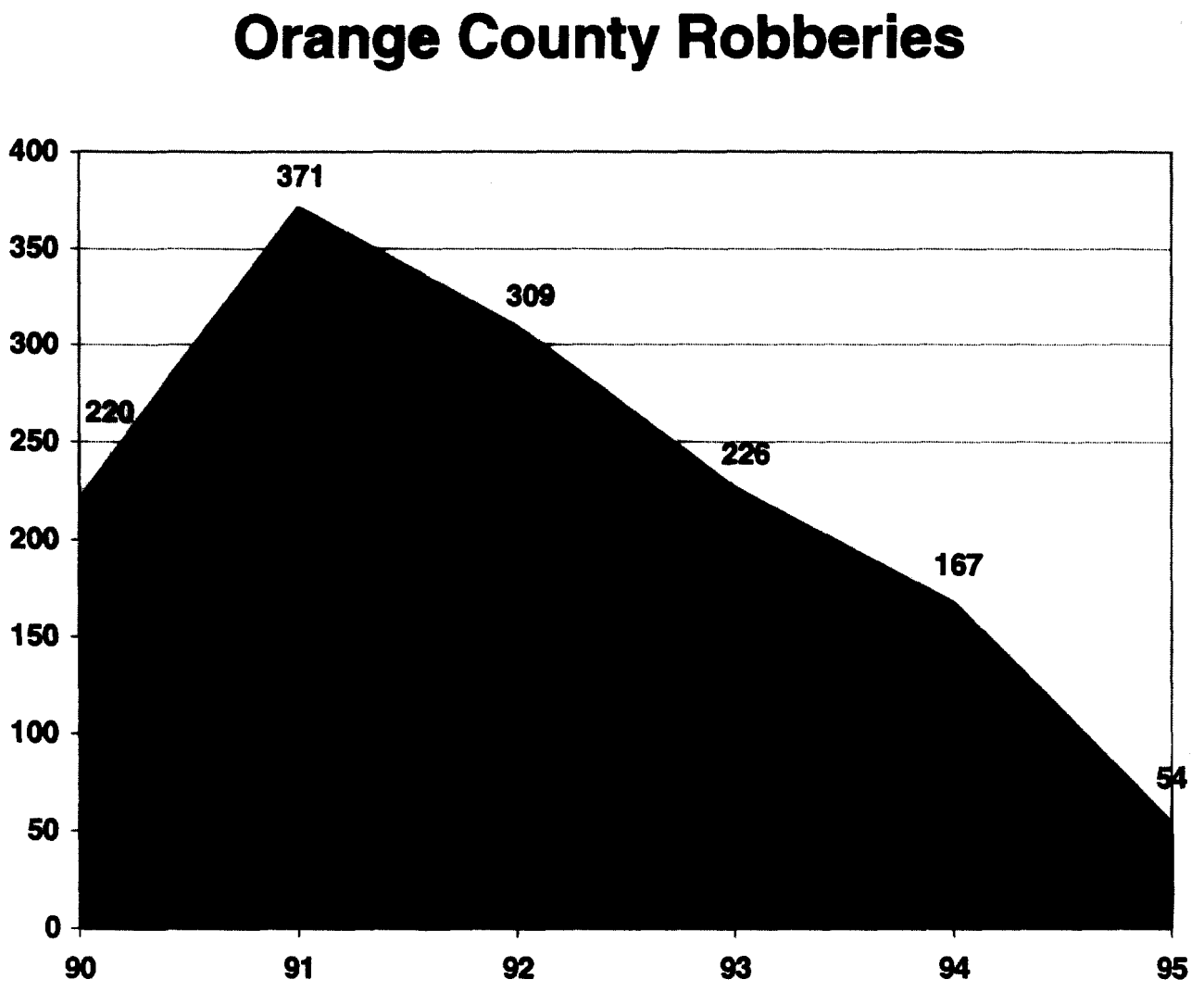
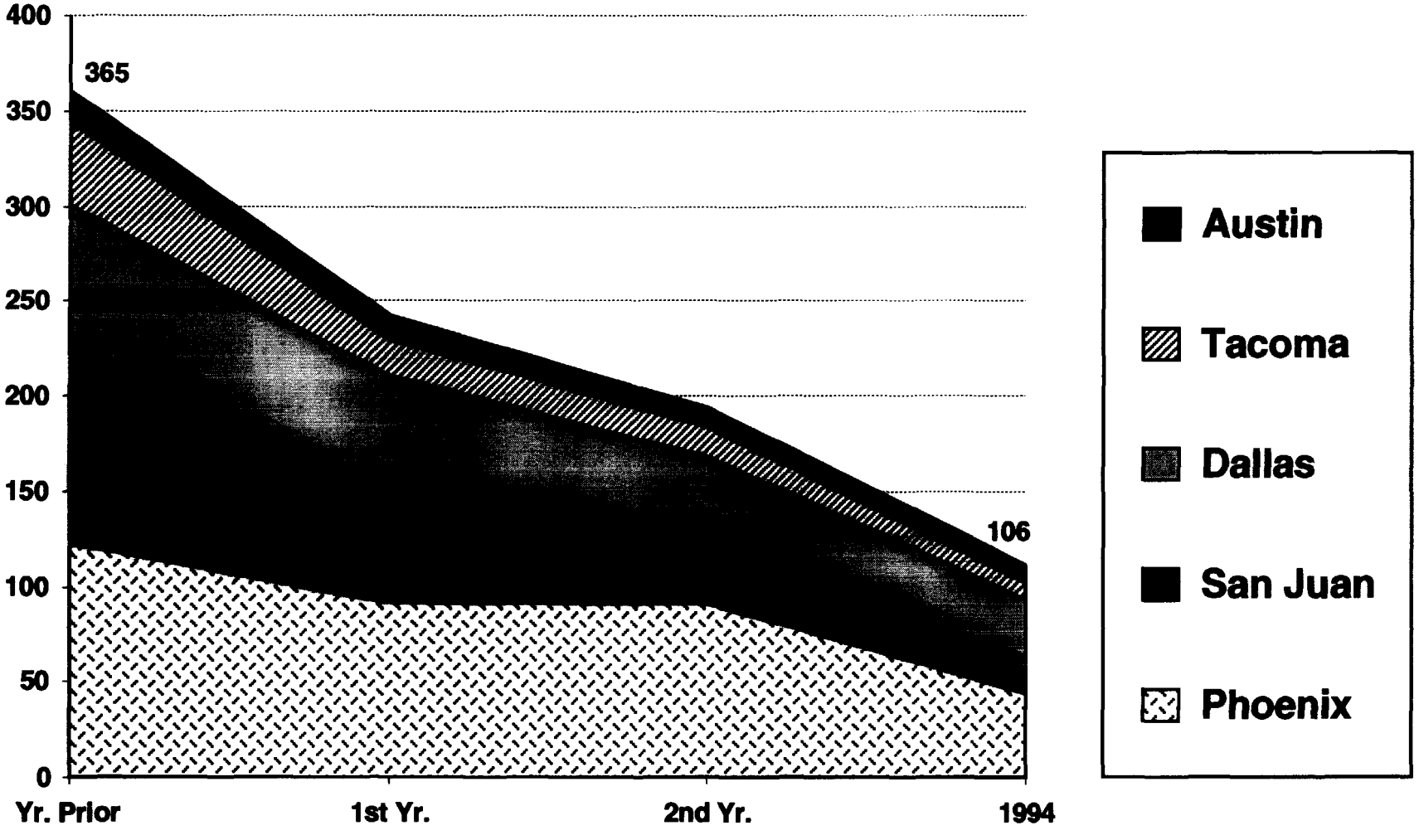
[4] *Id.*



Similar results are also shown for other cities in Figure 2. Thus, quick capture using the ETS system prevents clearly prevents "downstream" robberies and has a tremendous effect on crime.

Even more impressive, Austin, Texas' Police Department just reported that the city has had *no* robberies at *any* financial institution during the first six months of 1995. This is the

Downstream Robbery Impact



country's first *zero* robbery rate in a major metropolitan area, a remarkable achievement for such a large urban city.[5] The Austin Police Department credits use of the ETS system as one of the major tools making this possible. Again, millions of dollars of stolen goods were recovered thanks to the quick captures enabled by ETS.

ETS, however, is more than simply statistics. For many individuals and institutions, ETS has made an immediate and tangible impact against crime. Some recent examples include:

- A May, 1995, robbery of a new bank branch located inside a supermarket in Phoenix, Arizona, caused that branch to immediately install ETS TracPacs. The very next week, that same robber returned to again rob that branch. This time the robber was apprehended within 15 minutes using the ETS system and $2300 cash recovered.

- Another Phoenix armed robbery in April, 1995, resulted in the robber taking $4200. Using ETS, the Police responded within 11 minutes, so surprisingly fast that the robber killed himself with his own gun. The stolen money was returned to the bank.

- Three robbers with guns took $16,596 from an Anaheim, California, bank on the fringe of the ETS system. The robbers immediately drove out of the system and changed clothes and car. Thinking they were now safe, they drove back into Anaheim, the ETS system went "hot," and the police made the capture, recovering all the money. Notably, the three later confessed to other robberies in California.

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[5] A population of more than 750,000 is covered by that city's ETS system.

As remarkable as these instances are, these anecdotes are but a few of ETS's many, many success stories.[6]

For obvious reasons, ETS has consistently received enthusiastic support from the law enforcement community. Indeed, when ProNet announced that it was seeking a permanent spectrum allocation for ETS operations, over thirty law enforcement agencies and other institutions using ETS responded with pleas to the FCC, including the Federal Bureau of Investigation; the International Union of Police Associations, AFL-CIO; the City of Dallas; Bank of America; and, Wells Fargo Bank. A complete list of these institutions is attached as Exhibit B.

Under the circumstances, the Commission's conclusion that there are "substantial public benefits" to ProNet's proposed allocation is undeniable. This finding is also consistent with the Commission's earlier determination that the conceptually similar "Lo-Jack" tracking system served the public interest by "offer[ing] an effective means for dealing with [crime]."[7] The extension of ETS enabled by the use of dedicated LETS frequencies in the 216-217 MHz band will provide similar benefits in a band that is otherwise limited in its usefulness by its proximity to TV channel 13.

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[6] More incidents have been cited in ProNet's 1993 "Request To Modify Petition for Rule Making" RM-7794 before the Commission.

[7] Stolen Vehicle Recovery Systems, 4 FCC Rcd 7558, 7559 (1989). Quite properly, the Commission in that proceeding "place[d] great weight on comments filed by the various police and law enforcement organizations in support of such systems." *Id.*

III. PRONET STRONGLY SUPPORTS THE COMMISSION'S PROPOSED RULES GOVERNING THE USE OF THE 216-217 MHz BAND

As previously noted, ProNet has been a long time proponent of a permanent LETS allocation and has committed significant work to developing a practical technical framework for such uses. After careful review of the Commission's *Notice*, ProNet believes the Commission should be commended for providing a generally sound and reasoned balancing of interests and technical needs in the 216-217 MHz band. With the exception of two minor revisions suggested in Section IV, *supra*, ProNet supports the *Notice* proposals. Specifically:

- ProNet supports the use of 25 kHz channelization and the division of spectrum between LPRS and AMTS.[8]
- ProNet concurs with the Commission that MSA/RSA licensing regions are appropriately sized to provide the necessary coverage for the LPRS systems envisioned to be deployed in the band.[9]
- ProNet agrees with the Commission that limitations on obtaining multiple LPRS licenses is unnecessary and would unnecessarily constrain the advancement of law enforcement tracking systems.[10]
- ProNet generally agrees with the Commission that it would be appropriate to license LETS under the existing procedures set forth under Part 90 of the Commission's rules.[11]

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8 *Notice* at ¶8.

9 *Id.* at ¶9.

10 *Id.*

11 *Id.*

- ProNet supports the Commission's regulations concerning station identification, station inspection, and permissible communications. As discussed in Section IV, however, ProNet is requesting a minor modification to the eligibility regulations for LETS to accommodate an important new use of tracking technology.[12]

- ProNet generally concurs with the Commission's technical proposals for the band, including the proposed regulations governing type acceptance, channel plan, channel uses, transmit power, antenna height, emission types, and emission standards. However, as discussed in Section IV, ProNet is concerned that relatively high power operations adjacent to LETS channels are likely to cause potential interference, and ProNet offers a modification to the power limitations that should meet the Commission's goals for the band.[13]

In sum, the Commission's *Notice* admirably accommodates a broad range of potential uses while ensuring the ability of companies like ProNet to meet the needs of law enforcement.

In addition to its proposed rules, the Commission has also requested filers to address a number of specific issues. First, the Commission has asked commenters to identify "the advantages and disadvantages of permitting non-channelized emissions within the [216-217 MHz band]."[14] ProNet believes that channelization of the proposed band is absolutely required and fundamental to the operation of the ETS system. All available power of the ETS transmitters must be concentrated into one signal, through a specifically tuned antenna at a specific frequency, to reach as far as possible to a most sensitive receiver in which all possible measures (narrowest of band pass filters, *etc*) are taken to screen out extraneous electronic

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[12] Proposed Rules §§95.1021-25.

[13] Proposed Rules §§95.1031-43.

[14] *Notice* at ¶10.

signals and noise. To allow non-channelized emissions within the band would desensitize the receiver and degrade the system's threat-mitigating, enforcement, and recovery functions.

Second, the Commission requests comment on "the advantages and disadvantages of permitting eligibles in the AMTS service and eligibles in the [LPRS] to share each others' 216-217 MHz band channels on a secondary, non-interference basis."[15] ProNet recommends that the eligibles in the AMTS service and those in the LPRS Part 95 channels have the ability to share each others 216-217 MHz channels, subject to the transmitter power levels proposed and on a secondary, non-interference basis. As an initial matter, it is clear that AMTS channels will probably not be fully used away from the waterways served, and equally clear that future low power radio services serving the public interest and supporting the uses already proposed for this band will be developed. Conversely, should AMTS data transmission needs develop so as to cause excessive congestion in the proposed AMTS band, that body of users has an ability to expand, subject to lower power and non-interference constraints.

Finally, the Commission has asked whether the "proposed technical requirements for [LPRS] and AMTS operations [are] . . . consistent with protecting adjacent TV Channel 13."[16] ProNet, in fact, has made extensive tests of possible interference on TV Channel 13 by its transmitters, and included that test data in its previous Request To Modify Petition for Rule Making, RM No. 7784 (Oct. 26, 1993). The results of those tests clearly showed no detected interference on Channel 13. The report of those tests, which is duplicated and attached hereto

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[15] *Id.*

[16] *Id.*

for further reference as Exhibit C, demonstrates that Channel 13 is fully protected from interference by the ETS system.

IV. PRONET RECOMMENDS A FEW MINOR REVISIONS TO THE REGULATIONS TO MAXIMIZE THE BENEFITS OF THE ALLOCATION

Although, as previously discussed, ProNet generally supports the Commission's proposals for the 216-217 MHz band, ProNet believes that there are two minor modifications that would greatly enhance the use of the band. First, as discussed below, in light of the very low power nature of the proposals for the use of the band and the potential for interference by relatively higher powered adjacent and second adjacent channel transmitters, ProNet advocates extending the 100 mW power limitation to higher LPRS channels. Second, ProNet requests the Commission to modify the LETS eligibility criteria to clarify that a relatively newer, and much needed, security application of tracking technology would be permitted in the band.

A. The Commission Should Extend the 100 mW Limit to Higher LPRS Channels To Limit the Potential for Interference

Under the Commission's proposed channel plan, the thirty LPRS channels are *de facto* divided into two classes. First, on the lowest twenty LPRS (nos. 1-20), transmitter output power is restricted to 100 mW. Second, in the upper ten LPRS channels (Nos. 21-30), ostensibly because interference potential to TV channel 13 is decreased, the Commission has authorized a maximum power limit of 1 W. Under this plan, the dedicated LETS channels are the two channels at the highest end of the 100 mW band (Nos. 19 & 20). Given the nature of

the applications proposed for the band, as discussed below, ProNet believes the low power (100 mW) limitation should be extended to two additional channels.

The ability of law enforcement to use ETS to pick up, track, and locate TracPac signals activated during a crime is directly related to the ability of the tracking receivers to operate at their most sensitive and optimum capability. Any interference from other sources, in band and even at low signal levels, decreases or eliminates the tracking range, the range in which to find the signal, and delays the emergency response time. Thus, the key specification that allows ETS to provide its service, and for which the Commission's rules are most critical, is that of the in-band, stray signal power. The new receivers provided in the ETS system are capable of sensitivity of about -150 dBm.[17] Any stray signal with power above the background noise level in a typical urban area harmfully impedes and impacts the operation of the system.

Given the power limitations and emissions mask requirements on the lower adjacent channels (Nos. 17 & 18), ProNet does not anticipate detrimental interference from other

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[17] Due to the tremendous potential for interference to LETS operations from stray emissions, ProNet recently expressed concerns over the potential for allowing low earth orbit ("LEO") feeder downlinks in this band. Letter from Danny E. Adams, Counsel to ProNet, Inc. to Reed E. Hundt, Chairman, Federal Communications Commission, IC Docket No. 94-31 (June 7, 1995). The Commission indicated, in its recent WRC preparatory order, that it would ensure that LEO MSS operations do not interfere with LETS operations. Specifically, the Commission stated "[a] domestic proceeding would ensure that MSS systems could share in these bands without causing harmful interference to other domestically allocated services." Preparation for International Telecommunication World Radiocommunication Conferences, IC Docket No. 94-31, FCC 95-256 (June 15, 1995) at ¶20. ProNet continues to believe that the ability of LEO MSS systems to co-exist with LETS is in doubt, and expresses its reservations about any LEO MSS proposal for the band absent technical documentation that LEO MSS operations will not interfere with LETS. At a minimum, any LEO MSS allocation should only be co-primary, or secondary, to LETS operations. *See also* Petition for Clarification of ProNet, Inc., IC Docket No. 94-31 (July 17, 1995).

applications. However, the two upper adjacent channels can be operated at power level that is a magnitude greater than the lower adjacent channels, and, even under the attenuation profile proposed in the *Notice*, both Channel No. 21 and 22 are likely to raise the noise level on the LETS channels and significantly degrade performance. Moreover, given the extremely high power nature of television transmitters, the alternative of locating the LETS channels lower in the frequency band to create a "buffer" of lower power level operations is also problematic. If the LETS channels are located any closer to TV channel 13, ProNet believes the television signal could hamper proper functioning of tracking operations.

B. The Scope of Eligibility for LETS Channels Should Be Expanded To Include Educational Campus Security Officers To Allow a Beneficial New Application of Tracking Technology

Recently ProNet has entertained a number of requests for, and deployed on an experimental basis, a new application of its tracking system technology that is identical in technical operation to its present use, squarely in the public interest, and should be authorized by the Commission. Specifically, certain college and university campuses and other institutions have requested a "panic alarm" system to combat rising crimes against persons, such as rapes and assaults. In this application, each student, for example, would be provided a small, battery powered panic button device, perhaps attached to a keyring, which when pushed in a threatening situation, sends a location signal to the campus police dispatch station. This is, electronically, exactly how the ETS works in its present law enforcement use. The same power, frequency, channelization, and other technical controls would be used for this campus

security application as are required for the law enforcement tracking of stolen goods application. Campuses presently using such a system, which include University of Bridgeport, in Bridgeport, Connecticut, and George Washington University, in Washington, D.C., report excellent results.

While ProNet does not believe that such an application is inconsistent with the provisions of Section 95.1007 of the proposed rules, ProNet urges the Commission to clarify that such operations would be permitted. First, ProNet requests the Commission to expanded Section 95.1007 by adding a new subsection (f) stating:

> (f) Engaged in the operation of a commercial activity providing support for campus security and safety (such entities must have an agreement with the institution responsible for the area served).

Second, ProNet suggests that proposed Section 95.1025 (Permissible Communications) also be amended to include a new subsection (d) reading "Assist in providing security and safety services to campuses." Finally, the last sentence of proposed Section 95.1001 should be modified to read "The frequencies may also be used to assist in recovering stolen goods and campus security and safety," and subsection (c) of proposed Section 95.1025 should be modified to state "Provide stolen goods recovery services to law enforcement agencies or campus security and safety service communications."

V. CONCLUSION

As discussed above, ProNet strongly supports the Commission's proposal to allocate channels in the 216-217 MHz band for LPRS and, specifically, to dedicate two of those channels for LETS operations. LETS operations, like ProNet's ETS, have a significant, tangible effect on combating crime and preserving life and property. ProNet urges the Commission to act expeditiously to finalize the allocation for this important service, with only two minor modifications. ProNet believes the Commission should modify the band power limitations for, at a minimum, channel nos. 21 and 22 to limit operations on those frequencies to 100 mW and avoid detrimental interference to LETS operations. ProNet also encourages the Commission to permit eligible LPRS and AMTS users to share, on a secondary, non-interference basis, across all of the channels in the 216-217 MHz band.

Respectfully submitted,

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A

EXHIBIT A
PRONET EQUIPMENT TECHNICAL PARAMETERS

Table 1, PTS Transmitter: (2 types)

- Frequency Stability . . . . . = +/- 10 PPM
- Transmittal Power into 50 ohms . . . . . = 100 Milliwatts
- Antenna Loss . . . . . = 20 db
- Effective Radiated Power . . . . . = 1 Milliwatt
- Modulation . . . . . = AM/50%, both types
  - Type 1 . . . . . 90 Hz continuous tone
  - Type 2 . . . . . 63 bit digital code + 8 bits ID
- Polarization . . . . . = Linear
- Polarization orientation . . . . . Random (unpredictable)

Table 2. PTS Tracking Receiver Parameters

- Antenna:
  Three element, vertical 1/4 wavelength, Doppler tracking array mounted on top of vehicles, bottom of helicopter, and top of tall buildings.
- Antenna Gain . . . . . Less than 5 dBi
- Minimum pre-detection bandwidth . . . . . = 100 Hz
- Tracking sensitivity (minimum signal level for detection and directional data):
  - With tone transmitter . . . . . = -145 dBm**
  - With digital code transmitter . . . . . = -150 dBm**

** Note that both of these parameters are improvements over that specified in previous submissions to the Commission.

From this, it is clear that any inband stray signal with a power density greater than -155 dBm in a 100 Hz bandwidth will degrade the PTS systems. There are no other known communication systems that operate at such a low signal power. This requires, then, that all possible measures be taken to prevent interference of the LETS channels for optimum law enforcement operation.

EXHIBIT B

1. Shreveport Police Department
2. Police Department/City & County of San Francisco
3. Bank of America
4. Wells Fargo Bank
5. Best Product Co., Inc.
6. Las Vegas Metropolitan Police Department
7. PriMerit Bank
8. Valley Bank of Nevada
9. Carrs Quality Center
10. Sacramento County Sheriff's Department
11. City of Dallas
12. U.S. Dept. of Justice/FBI (Dallas, TX)
13. The Town of Highland Park, TX
14. Sunbelt Savings FSB
15. Swacha (Southwestern Automated Clearing House Association)
16. Tom Thumb Inc.
17. City of Huntington Beach
18. City of Costa Mesa
19. City of Fullerton, CA - Police Department
20. City of Signal Hill
21. City of Anaheim, CA - Police Department
22. City of La Habra - Police Department
23. City of Seal Beach - Police Department
24. First Interstate Bank of CA
25. Century Federal Savings and Loan Association - CA
26. Mercury Savings and Loan Association - CA
27. City of Portland, Oregon - Bureau of Police - OR
28. City of Reno Police Department - Police Department
29. Washoe County Sheriff's Office - NV
30. City of Houston - Mayor's Office c/o Chief of Police
31. International Union of Police Ass. AFL-CIO
32. U.S. Dept. of Justice/FBI - Washington, DC